

September 28, 2021

Hon. Jon E. DeGuilo
United States District Judge
124 Robert A. Grant Courthouse
204 South Main Street
South Bend, IN 46601

Re: Daniel Urquiza

Dear Chief Judge DeGuilo:

I met Dan in 9th grade. We were standing outside of geometry class, and he walked up to me and told me that he liked the sweater I was wearing and that his grandma knitted sweaters just like it. Typical of any high school know-it-all, my skeptical response was something like, “oh yeah, tell her to make me one.” That sweater, which I did get, was as warm and welcoming as Dan and the entire Urquiza family. Little did I know that this brief interaction would be the start of a friendship that is more than 3 decades old and still going.

Early in our friendship, we spent hours talking about music, his trips to Argentina to see family, and what the future would hold for us. Many of these conversations were at a hair salon that his father, Sergio, owned. The salon was my first exposure to what an entrepreneur was and how hard one must work at it. I wouldn't call the hair salon a wild success, but it was a steppingstone and explained a lot about Sergio, and years later, Dan. Anyway, what I found most interesting and probably what drew me to Dan most was the conversations about Argentina and his family. I could relate to his loyalty and sense of family first because that is how I was raised. I loved hearing him talk about his grandfather the rancher and how they would have large family reunions, grill, and just enjoy each other's company. Dan told me how his grandfather would have him work the ranch with him so he would know that the meat didn't magically appear on his plate. It took hard work, and then there would be a reward. I suspect this was the same lesson that his grandfather gave his father when he moved to the United States as a young man.

Over the course of the next 10 years, I became very close with Dan and his family and watched Sergio impress his own father's work ethic lessons on Dan and his brothers. Dan and I bounced back and forth between my parent's house and his, but I spent a great deal of time at his house, because it was also his family's business, and I was fortunate to have worked there. I could have worked at the local gas station

or convenient store, but I didn't. I worked at Meyer's Castle and the education I received there set me up for my entire life. It was long days doing everything from valet parking, busing tables, plating wedding dinners, breaking down large tents, and anything else that just needed doing. During every bit of the non-glamorous behind the scenes moments, Dan was right there with me; scrubbing the bathroom floors, plunging the toilets, and doing whatever had to be done during the 16 hour shifts we'd pull. It was exhausting. One night, I had just gotten done mopping the floors and accidentally knocked over the bucket of dirty water all over the floor I had just cleaned. Dan came around the corner and saw me standing over the accident. All he said was, "go home and get some rest, I got this." He then proceeded to run away with the mop so I couldn't do it myself even if I wanted to. I came back the next day determined to outwork him. I failed. The lessons and education I received working there were many, but most impressive is that I can't even begin to explain how much Dan and every member of his family went out of their way to ensure that every guest and employee felt like family and that nobody was going to outwork them. It just must be what you do when your entire family's security hangs in the balance of how hard you work and how you treat people. I found this admirable, which is why I worked for the Urquiza family for 3 years in high school and when I went away to college, I drove home on the weekends to continue to work next to Dan.

As Dan and I moved into the second decade of our relationship, we saw less of each other. Not because we didn't want to see each other, but both of us were establishing ourselves in our respective careers and time gets away from you. We'd see each other periodically, probably a few times a year, and catch up. After the obligatory, "que paso", Dan was always quick to ask about my Brother, Mom, and Dad. They really like him, and I'm not surprised. I was working in the area one time and stopped in at my parents. Dan was there. Apparently, he was driving by and saw my Mom outside watering her flowers. He had been there for over an hour when I arrived and was just chatting with my Mom. About what, I don't know, and it doesn't matter. What matters is that he cared enough about my family to stop, hang there, and catch up with her.

Over the course of the next several years, Dan moved from one endeavor to another. He couldn't silence the strong entrepreneurial spirit within him. I'd always say, "Dan, just run the wedding business". You could kill it. He didn't want to. That was the business his parents built. He wanted to build his own business. And that he did. Time went on and I am sure Dan had some business failures, but I would

never know it. Dan doesn't talk about himself. He just gets back up, learns, and moves on; better.

I always wondered if Dan's entrepreneurial drive would prevent him from wanting to start a family. I wondered if he would get married. I wondered if our wives would be friends. I wondered what type of father he would be. I wondered if our kids would know each other. In the past several years, we've shared many laughs, meals, and weekend trips with Dan, his wife Orinta, and his daughter Emilia. Whether it be taking a last-minute trip to a waterslide park in Wisconsin during the polar vortex or grilling hot dogs in the back yard, our families enjoy each other. Dan and I are certainly different people, but there is one thing that both of us have in common; we live for our daughters. Seeing him beam at even the sound of Emilia's name or voice is something, and I can see the way Emilia looks at him with love and trust. It is believed in some circles that the term "Helicopter Dad" was coined after Dan and fortunately for Emilia, Orinta is never far; else that poor girl would walk around in full body armor so he could protect her. I don't blame him. Emilia is so sweet and a dear friend to my daughters. Dan and Orinta make a good team and they are doing a great job raising an awesome kid.

Dan is busy. He's busy making sure Emilia gets to school, busy getting her to all of her activities when Orinta is working, and he's busy trying to learn how to play the piano so he can teach Emilia. Despite being very busy raising a daughter, he's also doing a very good job at being a son. Regardless of how busy he gets, he still manages to help his aging mother, Elizabeth, with the wedding business in the absence of his late father. He's busy making sure she gets to her various doctors' appointments and he's busy just being there to make sure she doesn't get lonely. Dan is never too busy for his family and his commitment to them. He leans in.

I saw Dan a few weeks ago. As good as it was to see him, the backdrop was the fact that he might have to go away to prison for his poor judgement. I now know that he's been quietly carrying the weight of this burden for a while. I learned of his troubles recently when I saw it on the front page of our hometown newspaper. I wish I would have been able to be there for him when he was going through this. He would have certainly been there for me.

I hope that the court recognizes that this man is everything to his daughter and she is everything to him. He is a family man and a dear friend. People make mistakes and he certainly recognizes the huge mistake he's made. Over the past

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year, I know he's played out the conversation a million times in his head about how he'd tell an innocent child that her daddy won't be able to drive her to school or gymnastics or teach her piano. If he is anything like me, playing that conversation over and over again in my head would be a terrible sentence and certainly enough to make sure that my "I's" and "T's" were dotted and crossed every day for the rest of my life.

Sincerely,

A large, stylized handwritten signature in black ink, appearing to read 'J. Taylor', is written over the typed name and contact information.

Jason Taylor
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